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UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

In re:
Petros Vasdekis and Aliky Melpo Vasdekis,

Case No. 13-43886

Chapter 13

R.S. No. MDE-1602

**MOTION FOR RELIEF FROM
AUTOMATIC STAY**

Hearing:

Date: December 2, 2015

Time: 9:30 a.m.

Place: Courtroom 220
1300 Clay Street
Oakland, CA 94612

Debtors.

**TO THE HONORABLE WILLIAM J. LAFFERTY, UNITED STATES BANKRUPTCY COURT
JUDGE, THE DEBTORS, DEBTORS' COUNSEL, THE TRUSTEE, AND OTHER
INTERESTED PARTIES:**

Toyota Lease Trust ("Movant") hereby moves this Court for an Order granting relief from the automatic stay under 11 U.S.C. § 362 as to the Debtors and Debtors' bankruptcy estate in the above-captioned matter so that Movant may enforce its remedies against the property in accordance with applicable non-bankruptcy law on the personal property commonly described as 2012 TOYOTA CAMRY, vehicle identification number: 4T1BF1FK5CU103509 (the "Property").

Movant hereby moves this Court for an Order granting relief from the automatic stay on the following grounds:

1 1. **Pursuant to 11 U.S.C. § 362(d)(1), Movant's interest is not adequately protected:** The
2 evidence establishes that the loan matured on May 24, 2015. Debtor has failed to execute the Purchase
3 Option or return the vehicle pursuant to the Agreement. Movant's interest in the Property is not
4 adequately protected.

5 Movant submits the attached Declaration and Memorandum of Point & Authorities, as well as
6 other evidence attached hereto in support of its Motion.

7 **WHEREFORE**, Movant prays that this Court issues an Order as follows:

8 1. An Order Granting Relief from the Automatic Stay to allow Movant, its successors, transferees,
9 and assigns, to proceed under applicable non-bankruptcy law to enforce its remedies against the Property.

10 2. The Order be binding and effective despite any conversion of this bankruptcy case to a case under
11 any other chapter of Title 11 of the United States Code.

12 3. The 14-day stay described by Bankruptcy Rule 4001(a)(3) be waived.

13 4. If relief from stay is not granted, Movant respectfully requests the Court to order adequate
14 protection.

15 5. Any further relief as the Court deems just and proper.

16 Dated: 10/30/2015

Respectfully Submitted,
Buckley Madole, P.C.

18 By: /s/ Mark D. Estle
19 Mark D. Estle
20 Attorney for Movant
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